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Attorneys for Plaintiff
United States of America

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

MYRA BOLECHE MINKS,

Defendant.

CASE NO. 2:22-cr-00137-JAM-2

**STIPULATION REGARDING
EXCLUDABLE TIME PERIODS UNDER
SPEEDY TRIAL ACT; ORDER**

DATE: November 19, 2024
TIME: 9:00 a.m.
COURT: Hon. John A. Mendez

STIPULATION

1. By previous order, this matter was set for status on November 19, 2024.
2. By this stipulation, the defendant now moves to continue the **further status conference** until **February 11, 2025, at 09:00 a.m.**, and to exclude time between November 19, 2024, and February 11, 2025, under Local Codes T2 and T4.
3. The parties agree and stipulate, and request that the Court find the following:
 - a) The government has represented that the discovery associated with this case includes approximately 3,800 pages of reports, video and audio recordings, and photographs. In addition, digital device extractions have been produced in discovery and amount to approximately 10 TB of data. All of this discovery has been produced directly to counsel.

1 b) Counsel for the defendant desires additional time to review the
2 discovery, discuss the case with the defendant, conduct investigation and research
3 related to the criminal charges, and otherwise prepare for trial.

4 c) Further, the defense has provided information to the United States
5 that the requires the United States to conduct follow up investigation. That follow
6 up investigation is not yet complete.

7 d) Counsel for the defendant believes that failure to grant the above-
8 requested continuance would deny him the reasonable time necessary for effective
9 preparation, taking into account the exercise of due diligence.

10 e) The government does not object to the continuance.

11 f) Based on the above-stated findings, the ends of justice served by
12 continuing the case as requested outweigh the interest of the public and the
13 defendant in a trial within the original date prescribed by the Speedy Trial Act.

14 g) For the purpose of computing time under the Speedy Trial Act, 18
15 U.S.C. § 3161, et seq., within which trial must commence, the time period of
16 November 19, 2024, to February 11, 2025, inclusive, is deemed excludable pursuant
17 to 18 U.S.C. § 3161(h)(7)(A), B(ii), (iv) [Local Code T2 and T4] because this is a
18 complex case and it results from a continuance granted by the Court at defendant's
19 request on the basis of the Court's finding that the ends of justice served by taking
20 such action outweigh the best interest of the public and the defendant in a speedy
21 trial.

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4. Nothing in this stipulation and order shall preclude a finding that other provisions of the Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial must commence.

IT IS SO STIPULATED.

Dated: November 14, 2024

PHILLIP A. TALBERT
United States Attorney

/s/ JUSTIN L. LEE
JUSTIN L. LEE
Assistant United States Attorney

Dated: November 14, 2024

/s/ TODD LERAS
TODD LERAS
Counsel for Defendant
Myra Minks

ORDER

IT IS SO FOUND AND ORDERED.

Dated: November 15, 2024

/s/ John A. Mendez
THE HONORABLE JOHN A. MENDEZ
SENIOR UNITED STATES DISTRICT JUDGE